

# EXHIBIT 2



IN THE DISTRICT COURT OF TULSA COUNTY  
STATE OF OKLAHOMA

BILLY D. HUDSON,

Plaintiff,

vs.

PROGRESSIVE NORTHERN  
INSURANCE COMPANY,

Defendant.

**CJ-2015-03167**

Case No. JEFFERSON D. SELLERS

DISTRICT COURT  
**F I L E D**

ATTORNEY'S LIEN CLAIMED AUG 26 2015

P E T I T I O N

SALLY HOWE SMITH, COURT CLERK  
STATE OF OKLA. TULSA COUNTY

COMES NOW plaintiff, Billy D. Hudson, and for his cause of action against the defendant, Progressive Northern Insurance Company, alleges and states:

1. That on or about March 2, 2009 plaintiff was a passenger in a 1997 Chevrolet K1500 truck owned by his employer, Jeff Frieling, and was on the way to a work site in Texas when there was an accident due to the negligence of one of plaintiff's co-employees.
2. That at the time of the accident listed in paragraph one above, the 1997 Chevrolet K1500 in which plaintiff was a passenger, was covered by a policy of uninsured motorist insurance with defendant Progressive Northern Insurance Company. Said policy was No. 62318962-2, and provided for uninsured/underinsured motorist coverage in the amount of \$100,000.00 per person.
3. The trip during which plaintiff was injured was an on-the-job injury that arose out of and within the course of plaintiff's employment with his employer, Jeff Frieling, who was a named insured on the policy. As a result, the liability portion of the policy did not provide insurance coverage.

P

2015 AUG 26 A 11:43  
SALLY HOWE SMITH  
COURT CLERK  
TULSA COUNTY  
OKLAHOMA

4. That as a result of the negligence of plaintiff's co-employee, plaintiff sustained injuries to his neck, low back, right hip, left shoulder, right shoulder, right hand, and right leg. Plaintiff has incurred medical bills to date and has suffered pain and disability. His condition is permanent, and he will continue to suffer pain and disability in the future.

5. Suit was filed in the District Court of Tulsa County, Oklahoma, Case No. CJ-2014-847 on March 3, 2014. The case was dismissed without prejudice on October 24, 2014.

WHEREFORE, the plaintiff, Billy D. Hudson, prays for judgment over and against the defendant, Progressive Northern Insurance Company, in the sum of \$100,000.00 with interest thereon at the statutory rate from this date until judgment, and thereafter at the statutory rate, the costs of this action, and such other and further relief as the Court shall deem equitable and just.



John L. Harlan, OBA # 3861  
Attorney for Plaintiff  
404 E. Dewey St.  
P. O. Box 1326  
Sapulpa, OK 74067  
(918) 227-2590